## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

UNITED STATES OF AMERICA	)
<b>v.</b>	) Case No. 1:16CR228
RUSLANS BONDARS	)
Defendant.	)

## **MOTION TO SEAL**

COMES NOW the defendant, Ruslans Bondars, by counsel, and respectfully moves this Honorable Court for an order sealing Defendant's *Daubert* Motion,

Defendant's Motion to Exclude, Exhibit A to Defendant's First Motion to Suppress, and the redacted portions of Defendant's Second Motion to Suppress, provisionally filed under seal on March 19, 2018. The defendant makes this motion upon the Government's request.

Respectfully Submitted, RUSLANS BONDARS By Counsel HARRIS & CARMICHAEL, PLLC

Jessica N. Carmichael, Virginia Bar 78339 Counsel for Defendant 108 N. Alfred Street, 1st Floor Alexandria, Virginia 22314 (703) 684-7908 jcarmichael@harriscarmichael.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of March, 2018, I will electronically file the foregoing pleading with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties in this action.

\_/s/

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